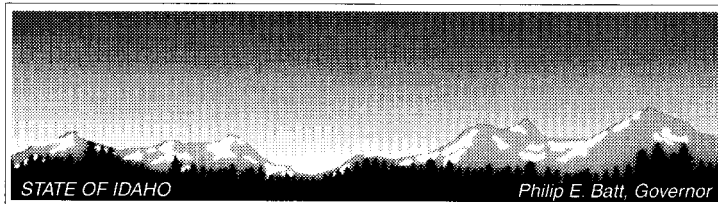


QA 28419



TRANSPORTATION DEPARTMENT
P.O. BOX 7129 • BOISE, ID • 83707-1129 • (208) 334-8000

DEPT. OF TRANSPORTATION
DOCKET SECTION

97 NOV -3 PM 3:26

October 29, 1997

Docket Clerk
U.S. DOT Dockets
Rm PL-401, 400 Seventh Street, SW
Washington, DC 20590-0001

Re: (Docket No. FHWA-97-2759) - 48

Dear Docket Clerk:

This in response to the Notice of Proposed Rulemaking request for comments regarding English language requirements and qualifications of CDL drivers.

We offer the following comments for consideration:

Such a rule would increase the pressure to give skill tests and written tests in several other languages. There are significant costs associated with such tests, including the costs of developing such tests. There are also significant costs associated with hiring and training of people to conduct skill tests, but of more concern are the safety implications.

- The presence of an interpreter for skill tests raises the concern for lack of space in an individual vehicle for a third person.
- There is the associated delay for an interpreter to pass along instructions to the person taking the test.
- There is legitimate concern for the validity of the pre-trip inspection when all information flows only through an interpreter.
- The state of Idaho has little to no capacity to hire or train interpreters or provide for translated documents and manuals.
- We find no studies or statistics that identify language barriers as a contributing factor to crashes.

Sincerely,

Morris W. Detmar, Administrator
Division of Motor Vehicles

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